TREP-1325.02 (REV. 10/97) Previously RF-46522

CORRES. CONTROL INCOMING LTR NO.

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DUE DATE





ROCŘY FLATS FIELD OFFICE P.O. BOX 928 GOLDEN, COLORADO 80402-0928



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Mr. Tim Rehder Rocky Flats Team Leader U. S. Environmental Protection Agency, Region VIII 999 18th Street, Suite 500 Denver, Colorado 80202-2466

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Mr. Steve Gunderson Colorado Department of Public Health and Environment 4300 Cherry Creek Drive South Denver, CO 80222-1530

Dear Tim and Steve,

Enclosed is the RFCA Quarterly Report. This report covers activities at the Site which occurred during the first quarter of FY98.

This report does not attempt to cover discussions, negotiations, and progress which has been made since the first of the year regarding the RFCA milestone dispute and NPDES issues.

If you have any questions please contact me at 966-4839.

Sincerely,

Steven W. Slaten

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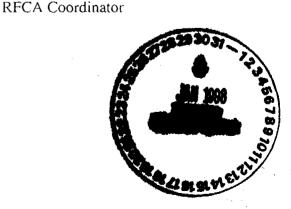
DOE ORDER #

Enclosures

cc w/Encs:

J. Legare, AMEC, RFFO B. April, RLG, RFFO

Administrative Record



ADMIN RECORD
A-SW-002614

#### QUARTERLY STATUS REPORT

# RFCA IMPLEMENTATION

# ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

#### FIRST QUARTER FISCAL YEAR 1998

#### 1.0 Introduction

Pursuant to paragraph 263 of the Rocky Flats Cleanup Agreement (RFCA or Agreement), this quarterly status report presents the progress toward implementation of activities covered under the Agreement. The RFCA is a legally binding agreement between the Department of Energy (DOE), the Environmental Protection Agency (EPA), and the Colorado Department of Public Health and Environment (CDPHE) to accomplish required cleanup of radionuclide and hazardous substance contamination at and from the Rocky Flats Environmental Technology Site (RFETS or Site).

This report describes activities that occurred from October, 1997 through December, 1997 (referred to as the first quarter of fiscal year [FY]98) and future planned activities. The sections of this report are organized into the following topics: (1) Introduction; (2) Site-wide Activities; (3) Implementation of the RFCA; (4) Water Management; (5) RFCA Milestones and Target Activities; (6) Site Closure Project; and (7) List of Approved Decision Documents.

#### 2.0 Site-wide Activities

During the first quarter of FY98, several site-wide activities continued. These activities include: (1) the Draft 2006 Plan (formerly the Ten Year Plan); and (2) Actinide Migration Studies.

#### 2.1 The Draft 2006 Plan (formerly the Ten Year Plan)

On June 12, 1997 the DOE simultaneously released both the National and Rocky Flats Discussion Draft, 2006 Plan (called "Accelerating Cleanup: Focus on 2006). This document presents alternative planning scenarios to achieve accelerated Site closure when compared to the 1996 Baseline Environmental Management Report. The Rocky Flats Discussion Draft 2006 Plan contains an evaluation of five planning scenarios (called "cases"), all of which would lead to the cleanup of the Site. All five are consistent with the reasonably foreseeable end state discussed in the Rocky Flats Vision document, but the period of time it takes to achieve the end state varies due to assumed annual funding levels and assumptions regarding when Rocky Flats Special Nuclear Materials will leave the Site. The time to achieve cleanup ranges from about 13 years to 30 years and the cleanup project cost ranges from \$7.3 billion to \$16.1 billion.

In the Discussion Draft 2006 Plan, the DOE Headquarters established a goal of achieving cleanup of Rocky Flats by 2006. The DOE believes a 2006 cleanup can be achieved through re-engineering efforts, benchmarking to best-in-class commercial standards, developing innovative contractor incentive programs and implementing new technologies that result in cost and schedule improvement. At present, however, the Rocky Flats Closure Baseline shows a 2010 completion date at a cost of around \$7:3 billion.

DOE is particularly interested in establishing a collaborative effort with stakeholders in shaping the future for the cleanup of the DOE Sites. The public comment period for the Discussion Draft (both the National and Rocky Flats plans) ended on September 9, 1997. DOE released a comment disposition document in November, 1997.

The current Draft 2006 Plan Guidance calls for the next draft of the 2006 Plan to be released to Congress and the public in February, 1998. This plan will include a Status Plan which will address the status of existing action plans on issues/opportunities which have been identified by stakeholders, sites, and DOE for evaluation. For new issues/opportunities that can not be easily resolved, Action Plans will be developed to define the path forward, clarifying the decision to be made, the decision maker, opportunities for public involvement in the decision process and the schedule for resolution.

The Site is utilizing the existing Life-Cycle Baseline (LCB) data to the greatest extent possible in preparation of the next Draft 2006 Plan.

# 2.2 Actinide Migration Evaluation

During the first quarter of FY98, the following Actinide Migration Studies activities were accomplished: (1) a meeting was held with the Advisory Group, regulators, and stakeholders on October 27-28, 1997 to discuss FY97 findings; (2) Dr. Greg Choppin (the independent reviewer of the Actinide Migration Studies), Dr. Bruce Honeyman from the Colorado School of Mines, Dr. Dave Janecky from Los Alamos National Labs, and site personnel attended an introductory meeting with regulators and stakeholders on November 19, 1997 to discuss FY97 findings and proposed path forward; (3) DOE-Rocky Flats Field Office (RFFO) released the final report of FY97 findings to regulators and stakeholders; (4) finalized inter-agency agreement between DOE-RFFO and the Unites States Geological Survey; (5) finalized contract between the Colorado School of Mines and Kaiser-Hill Company, L.L.C. (K-H); and (6) attended internal meetings about FY98 work scope. A meeting with the Advisory Group, regulators, and stakeholders is planned for late-January, 1998 to discuss the proposed FY98 work scope.

# 3.0 Implementation of the RFCA

Activities associated with the implementation of RFCA during the first quarter of FY98 include: (1) close of the 60-day public comment period for the National Pollutant Discharge Elimination System (NPDES) permit; (2) the Integrated Monitoring Plan; (3) the Life-Cycle Baseline; and (4) Potential In-State Disposal of Low Level/Low Level Mixed (LL/LLM) Waste. These RFCA implementation activities are discussed below.

#### 3.1 NPDES Permit

Attachment 5 of the RFCA states that once the changes to the water quality standards have been made, EPA will issue a new NPDES permit within six months of Colorado Water Quality Control Commission action. Comments on the draft permit were submitted by DOE, K-H, and Rocky Mountain Remediation Services, L.L.C. (RMRS) by October 15, 1997. The public comment period closed on October 15, 1997. The CDPHE issued conditional 401 certification of the draft permit on November 14, 1997. Further discussion regarding the conditional 401 certification are expected early in the second quarter of FY98.

# 3.2 Integrated Monitoring Plan (IMP)

The IMP document format was modified during the fourth quarter of FY97 in an effort to streamline the information into a more easy to read and understandable format. The monitoring definition was not altered, it was just put into tables and figures while excluding the basic management process defined by the Data Quality Objectives (DQO). The new version of the FY97 IMP was presented at an Integrated Monitoring Working Group meeting held on December 10, 1997. The original document, with all the DQO process information included, was released in final form in late December, 1997 and is now referred to as the IMP Background Document.

The Integrated Monitoring Working Group will begin working on the FY98/99 IMP starting in January, 1998 by meeting as media-specific groups. These meetings will be held during the third and fourth weeks of January, 1998. The goal for the media-specific working groups is to define not only FY98 requirements, but FY99 requirements as well, which will be useful in the FY99 budget planning process.

A follow-up Integrated Monitoring Working Group meeting is scheduled for March 5, 1998. The Integrated Monitoring Working Group is intending to meet about every two months to integrate what the media-specific groups develop. It is anticipated that the FY98/99 IMP would be available around June, or July, 1998.

#### 3.3 Life-Cycle Baseline (LCB)

Revision 2 of the LCB was issued in September, 1997. This revision merged the life-cycle baseline and Focus on 2006 Plan (Ten Year Plan) databases into a single baseline. The new resulting baseline is presently being reviewed and evaluated in detail by Kaiser-Hill through a process referred to as the "baseline improvement plan." This improvement effort is directed at resolving all logic, work scope, and schedule conflicts between the current work plan (FY98), the Discussion Draft -- Focus on 2006 Plan, and LCB Revision 1. Findings from this effort will be evaluated, impacts determined, and baseline change proposals prepared – as required – to update the LCB.

The FY98 work plan was presented to the Site Change Control Board (SCCB) in late September, 1997. Approval from the SCCB was obtained on September 26, 1997. The FY98 work plan is wholly integrated with the LCB, and contains approved RFCA milestones and target activities. New milestones and target activities will be incorporated into the LCB via a baseline change proposal once approved. Consistent with the "rolling wave" planning concept, as FY98 progresses planning details will be added to the LCB for the FY99 work effort. The initial draft of the FY99 work plan should be completed in the Spring, 1998. As experience with the LCB increases, it is expected the planning horizon will be extended even further into the future each year.

#### 3.4 Potential In-State Disposal of LL/LLM Waste

Efforts continued to explore possible sites within Colorado as an alternative treatment and disposal location for LL and LLM waste from the Site. This is being conducted with DOE Headquarters, especially with regard to departmental policy associated with off-site disposal of low level and low level mixed waste.

#### 4.0 WATER MANAGEMENT

Water management activities during the first quarter of FY98 include: (1) surface water management; (2) surface water monitoring; and (3) ground water monitoring.

# 4.1 Surface Water Management

During the first quarter of FY98, the Site completed several pond water transfers and discharges which are described below. Non-routine discharges are identified and were performed in support of the Pond B-5 outlet works upgrades project which began on October 1, 1997.

Pond A-3 activity included four routine outlet valve direct discharges to pond A-4 totaling 36.2 million gallons (MG). The first discharge of 11.1 MG occurred during the period of October 10 through 20, 1997. The second discharge of 8.8 MG occurred during the period of October 30 through November 4, 1997. The third discharge of 13.3 MG occurred during the period of November 21 through December 5, 1997. The fourth discharge of 3.0 MG occurred during the period of December 29 through 31, 1997.

Pond A-4 activity included two routine outlet valve direct discharges to North Walnut Creek totaling 45.9 MG. The first discharge of 9.6 MG occurred during the period of October 1 through 10, 1997. The second discharge of 36.3 MG occurred during the period of November 21 through December 5, 1997. Water quality samples were collected and analyzed, and all approvals were obtained prior to the discharges. The City of Broomfield diverted the A-4 discharges around Great Western Reservoir via the Broomfield Diversion Ditch.

Pond B-3 activity included one non-routine pumped transfer to Pond A-3 totaling 16.7 MG. This transfer occurred during the period of October 1 through December 31, 1997.

Pond B-5 activity included one non-routine outlet valve direct discharge to South Walnut Creek and one routine pumped transfer to Pond A-4 totaling 12.1 MG. The non-routine outlet valve direct discharge of 4.0 MG occurred during the period of October 1 through 10, 1997. The pumped transfer of 8.1 MG occurred during the period of October 13 through December 31, 1997. Water quality samples were collected and analyzed, and all approvals were obtained prior to the direct discharge. The City of Broomfield diverted the B-5 direct discharge around Great Western Reservoir via the Broomfield Diversion Ditch.

Pond C-2 activity included one pumped discharge to Woman Creek utilizing the reconfigured C-2 discharge pipeline. The discharge of 11.1 MG occurred during the period of December 8 through 15, 1997. Water quality samples were collected and analyzed, and all approvals were obtained prior to the discharge. The Mower Ditch headgate remained closed to direct the discharge to the new Woman Creek Reservoir as requested by the City of Westminster.

Pond C-2 activity also included an outlet valve exercise conducted on December 16, 1997. This exercise was conducted in accordance with Colorado State Engineer Office procedures. The valve was last exercised in 1989. The State Engineer Office had waived this outlet exercise requirement for the years preceding 1997. The valve was opened for 20 minutes and approximately 5000 gallons were discharged. Water quality samples were collected and are being analyzed, and all approvals were obtained prior to the discharge.

There was no Pond A-1, A-2, B-1, B-2, or Landfill activity during the first quarter.

# 4.2 Surface Water Monitoring

During the first quarter of FY98, 64 automated monitoring system samples were collected and submitted for analysis. For samples collected from RFCA Point of Compliance monitoring locations, all 30-day moving average results were well below the RFCA standards. For samples collected from the RFCA Point of Evaluation monitoring locations GS10 and SW093 the 30-day moving average results were below the RFCA Action Levels by the end of October, 1997.

The Walnut Creek Source Evaluation is continuing. Significant efforts occurred during the first quarter of FY98 on reporting activities related to elevated RFCA water-quality results measured at Walnut Creek Point of Compliance and Point of Evaluation monitoring locations in the Walnut Creek drainage. During November, the Actinide Migration Study group was briefed on surface water monitoring and the Walnut Creek source investigation progress. In attendance was Dr. Greg Choppin, an independent assessor for issues on legacy contamination and the Walnut Creek source investigation.

Progress Report #2 to the Source Evaluation and Preliminary Mitigation Plan for Walnut Creek (RF/RMRS-97-115.UN) was finalized and delivered on November 17, 1997, to EPA, CDPHE, Westminster and Broomfield. Progress Report #2 documented source evaluation actions for Walnut Creek gaging stations GS03, GS10, and SW093 and included data received through October 31, 1997. A summary presentation was given at the December 2, 1997, Surface Water Issues Meeting.

On December 31, 1997, Progress Report #3 to the Source Evaluation and Preliminary Mitigation Plan for Walnut Creek (RF/RMRS-97-131.UN) was finalized and delivered to EPA, CDPHE, Westminster and Broomfield. Progress Report #3 documents source evaluation actions for Walnut Creek gaging stations GS03, GS10, and SW093 and included data received through December 1, 1997. A summary presentation will be given at the January Surface Water Issues Meeting. To date, no localized source responsible for the elevated 30-day average activities has been identified.

Gaging station GS37 was installed in Central Avenue Ditch north of Building 443. This Performance Monitoring location supports the D&D of Building 123. Gaging station SW118 has been upgraded to collect continuous flow-paced samples. This serves as a Source Location monitoring station in support of the source evaluation for SW093. Seven additional Source Location monitoring stations are in the process of being installed to support the source evaluations for GS03, GS10, and SW093. Detail on these stations is included in Progress Report #3.

Temporary upgrades have been completed at GS03, GS10, and SW093 to reduce the risk of frozen sample collection equipment. Proposed permanent freeze protection systems will employ submersible heat tape systems at all POC locations. Engineering staff and construction cost estimators are formulating an accurate cost estimate on the modification and/or construction of reliable AC line power at POC locations. When the final project cost estimate is established, negotiations between RMRS and K-H will commence to secure additional funding. Once the project is funded, contracts will be let to complete the installation of AC line power and freeze protection for sampler operations. In addition to providing a cost estimate for AC line power, construction cost estimators are developing an estimate to upgrade the primary measuring device at GS01 with an H-flume capable of accurately measuring all anticipated surface water flows.

# 4.3 Ground Water Monitoring

The 1997 Second Quarter RFCA Ground Water Monitoring Report included analyses on all but a few samples that were not received in time for evaluation. Public presentation of the Second Quarter data was done at the State Information Exchange meeting on November 25, 1997. Issues dealing with data quality for historic radionuclide data and data validation were discussed with CDPHE and EPA at a groundwater work group meeting held December 4, 1997.

5.0 Status of RFCA Milestones and Target Activities (M&TAs)

The FY98 and FY99 M&TAs were established by EPA and CDPHE during the first quarter of FY98. A description and status of the FY98 M&TAs, including the first quarters accomplishments, are listed below. Attached is a table summarizing the status of each project. Discussions, meetings and negotiations are continuing in the second quarter of FY98.

5.1 Either a) construct new facility for storage of TRU/TRM by 9/30/98 or b) by 9/30/98 demonstrate adequate storage available for TRU/TRM
[FY98 Milestone M1]

Waste generation profiles, shipping schedules, and available storage capacity are assessed on a regular basis. These analyses currently conclude that no additional TRU/TRM storage capacity is required in FY98. A presentation to EPA and CDPHE representatives was made on October 24, 1997, and agreement was made to reassess the situation in January or February, 1998 and meet again. Storage module design is planned in FY98, as well as initiatives to optimize storage footprint and stacking configurations to ensure that adequate capacity remains in the event that assumptions used in the storage analysis should change dramatically. Storage module construction, if needed, is planned in FY99.

5.2 Complete construction of a new TRU/TRM repackaging facility by 9/30/98 [FY98 Milestone M2]

This activity is underway. In the first quarter of FY98, a "Request for Proposals" was sent to prospective design/build subcontractors and bids were received. In the second quarter of FY98, a contract award will be awarded and significant progress on design activities will be made.

5.3 Complete removal of 40 gloveboxes from Building 779 by 9/30/98 [FY98 Milestone M3]

Integrated Work Control Packages are being completed utilizing the Enhanced Worker Safety approach, and workers are being trained to conduct the glovebox removal. Upon approval of the DOP and notification of readiness to proceed from DOE the actual removal of gloveboxes will proceed.

DOE has invoked the RFCA dispute resolution process to address the acceptance by DOE of this milestone.

5.4 Either a) ship cumulative amount of 48% of 10/1/96 pondcrete/saltcrete inventory off-site and evacuate all wastes from Tents 2, 8, and 12 by 9/30/98 or b) make the decision to construct additional onsite storage for pondcrete/saltcrete by 12/31/97
[FY98 Milestone M4]

On schedule, as of December 31, 1997, 1811m<sup>3</sup> of saltcrete/pondcrete have been shipped.

5.5 Ship 375 drums of TRU/TRM to WIPP by 9/30/98, assuming a May 1, 1998 opening [FY98 Milestone M5]

WIPP is currently scheduled to open in May, 1998. The New Mexico Environmental Department (NMED) has informed DOE-Carlsbad Area Office (CAO) that they will not have approved the Part B permit for disposal of regulated waste by May, 1998. If the Part B permit is not approved by May, 1998, then approximately half of the drum inventory characterized in FY97 is not eligible for disposal at WIPP as non-regulated waste. Approximately 15% of the characterization effort for FY98 was completed during the first quarter of FY98. The majority of characterization is scheduled for the third and fourth quarters of FY98. DOE-CAO conducted an audit of Rocky Flats Acceptable Knowledge December 16 through 19, 1997. RFETS passed the audit with a single finding. DOE-CAO noted a marked improvement in the TRU Program since the July audit and expressed confidence in the likelihood of certification after the final audit in February.

Meet or exceed the previous year's off-site shipment of LL waste (FY97 shipped amount = 1287 m<sup>3)[FY98 Milestone M6]</sup>

On schedule; as of December 31, 1997, 404 m<sup>3</sup> of LL waste have been shipped.

5.7 Complete Trench T-1 accelerated cleanup by 9/30/98 [FY98 Milestone M7]

In preparation for the remediation of Trench T-1, a burial site of depleted uranium, a PAM was prepared, and was approved by the EPA on August 27, 1997. The activity control envelope planning, and field documents including the auditable safety analysis, health and safety plan and procurement documents were also initiated.

In the first quarter of FY98, procurement of an off-site treatment subcontractor was completed. Site preparation activities were initiated, including installation of the T-1 field support trailers, electrical power and telephone service. Gravel was spread at the T-1 work site to establish a better working surface, and the security bunker was removed from this site.

The T-1 Activity Control Envelope (ACE) team met to evaluate the project hazards and controls associated with the treatment process and the weather shelter. ACE team members included representatives from RMRS, Safe Sites of Colorado, Inc. (SSOC), K-H, DOE, and the treatment subcontractors. Project team members began revision of the T-1 ACE document to incorporate the work controls identified by the ACE team.

Planning activities that continued in the first quarter of FY98 included: preparation of the Field Implementation Plan; Health and Safety Plan, and the Sampling and Analysis Plan (SAP); initiation of regular enhanced work planning meetings; and submission of a request for a contained-in determination so that uranium and soils sent to the off-site treatment facility containing de minimus levels of listed materials are not regulated under RCRA. Project control documents are expected to be completed by the end of the second quarter of FY98.

The scheduled date for completion of the milestone for accelerated cleanup of Trench T-1 is September 30, 1998. Cleanup includes removal of waste and buried debris from Trench T-1, off-site shipment of depleted uranium, and packaging and appropriately storing other generated wastes.

5.8 Complete work described in PAM for Building 123 and 123S by 9/1/98 [FY98 Milestone M8]

The Building 123 Decommissioning Project is on schedule to complete the capping of the pipes and slab penetrations by March 31, 1998. The No Further Action determination is still expected to be received by June 1, 1998. The Building 123 project has completed the initial stripout of the attached equipment and the asbestos contractor is 10% complete. The subcontractor also has removed the lead lines lung counter which is being given to the Russians for their use.

The Building 123 project is scheduled to submit the Building Demolition Plan to the State during the second quarter of FY98. Demolition is planned for April 21, 1998. The Asbestos Abatement Plan was submitted to CDPHE on December 22, 1997 for their information.

The RCRA Unit 40 Plan has been submitted for review and comments.

Develop, finalize, and begin implementation of a site-wide natural resource management plan by 9/30/98 [FY98 Milestone M9]

The Rocky Flats Field Office (RFFO) initiated the planning process for developing a draft Natural Resource Plan. During the second quarter of FY98, RFFO will continue development of the draft Natural Resource Plan, expand stewardship issues and process participation with stakeholders/regulators.

5.10 Install and operate SPS in B707 by 9/30/98 [FY98 Target Activity T3]

The SPS System is currently scheduled for operation by March 1999. Negotiations with British Nuclear Fuels (BNFL) are continuing and currently established a delivery date for the system by February 3, 1998. Work is continuing in preparing Building 707 for the installation of the system. BNFL is planning to repair the SPS system and continue system checkout.

DOE has invoked the RFCA dispute resolution process on this target activity.

5.11 Thermally stabilize 90% of the plutonium oxide generated during the year by 9/30/98 [FY98 Target Activity T5]

Stabilization of 90% of the plutonium oxide generated during the year is on schedule.

5.12 Ship 35 SNM shipments off-site by 9/30/98 [FY Target Activity T7]

The shipment of SNM is currently on schedule for completion of 35 shipments by 9/30/98. Issues that could affect our ability to achieve this include: funding for receiver sites to receive RFETS shipments, and priority at receiver sites versus other programs. Efforts are continuing with DOE Headquarters to identify funding sources for these activities.

# 5.13 Close three plutonium ES&H vulnerabilities by 9/30/98 [FY98 Target Activity T9]

The closure of three plutonium vulnerabilities is on schedule. Work will continue with special emphasis on the pit shipments during the year. Receiver site availability may adversely affect meeting this target activity.

# 6.0 Site Closure Project

The site is continuing efforts to close Operable Units (OUs) that are not currently associated with a milestone. These projects, including the first quarter's accomplishments, are listed below.

#### 6.1 Environmental Restoration

The OU consolidation under RFCA established the Buffer Zone and Industrial Area OUs, and left OUs 1, 3, and 7 intact. Operable Units 5 and 6 remain in place with some minor modifications. The following actions were completed for each OU during the first quarter of FY98.

#### 6.1.1 OU 1

Pursuant to the OU1 Corrective Action Decision/Record of Decision (CAD/ROD), a remedial action for IHSS 119.1 was initiated in April, 1997 using closure funds. As required by the CAD/ROD, an investigation was completed for potential downgradient sources. Another investigation was completed to acquire information for determining worker health and safety requirements. Based on the results, it was concluded by the lead regulatory agency and DOE to proceed with an amendment to the CAD/ROD calling for long term monitoring with No Further Remedial Action. Alternatives to support this action are being evaluated, and the Amendment is expected to be drafted in the second quarter FY98.

#### 6.1.2 OU 5

In light of the fact that four areas within OU5 may contain radionuclides in subsurface soils in excess of the RFCA Soil Action Level, DOE submitted a written proposal to the regulators to consolidate the OU5 IHSSs into the Buffer Zone OU and address them according to the ER ranking. In addition, DOE requested written approval from the EPA on the RFI/RI Report.

#### 6.1.3 OU 6

DOE staff has reviewed background information for OU6 in preparation for finalizing the RFI/RI Report and preparing the Proposed Plan. DOE expects to ask for final RFI/RI Report approval and to draft the OU6 proposed plan during the third quarter of FY98.

#### 6.1.4 OU 7

The passive seep collection system continues to operate with no changes since last quarter. Discussions are still underway to identify the technical issues concerning the cessation of treatment. A sampling program was initiated in the fourth quarter of FY97 to demonstrate a monitoring history consistent with turning the system off after a specified period of time. The sampling program continued in the first quarter of FY98. The data collected will be evaluated and a recommendation will be made in the second quarter FY98.

The OU7 landfill will be addressed when it moves up in priority on the ER ranking list.

#### 6.1.5 Buffer Zone OU

# 6.1.5.1 Trench T-1 (IHSS 108, BZ OU)

The completion of the Trench T-1 accelerated cleanup is RFCA milestone M7. For a status on the milestone, see section 5.7.

#### 6.1.5.2 903 Pad and Lip Area (IHSSs 112/155, BZ OU)

A SAP for characterization of the 903 Pad, Lip Area and Americium Zone was submitted to EPA and CDPHE during the first quarter of FY98. Their comments were incorporated, and a revised SAP was submitted to the agencies in mid-December, 1997. Field work is scheduled to begin during the second quarter of FY98. The purpose of this SAP is to further refine the volume estimates of radiologically-contaminated surface and subsurface soils and VOC-contaminated soils for selection of appropriate remedial designs.

#### 6.1.5.3 Mound Plume

The site continues to work on a collection/treatment system for the Mound Site Plume. Funding continues in FY98 from DOE-HQ (EM-50 Office of Technology and Development) and it is anticipated that installation of the system will begin in the second quarter of FY98 ahead of the proposed RFCA milestone schedule of FY99.

# 6.1.5.4 East Trenches and 903 Pad/Ryan's Pit Plumes

A subcontractor was procured to characterize, select a remedial action, and develop a conceptual design for these VOC-contaminated plumes in December, 1997. Development of SAP will begin in January, 1998 and characterization should begin in the second quarter of FY98.

#### 6.1.5.5 Solar Ponds Plume

During the first quarter of FY98, efforts were focused on further evaluation of the nature and extent of the plume and of the phytoremediation alternative. Sampling of existing vegetation in the Solar Ponds Plume was conducted in the Fall of 1997 to evaluate the uptake of uranium in native plants. In addition, sampling plans were developed during the fourth quarter for characterization of the groundwater in the plume area and sampling of soils to determine agronomic conditions for phytoremediation. During the second quarter of FY98, groundwater and soil sampling will be conducted, modeling efforts will begin to determine the long term impacts of the plume and the best remediation strategy and a further evaluation of phytoremediation will be initiated.

#### 6.1.6 Industrial Area OU (IA OU)

A data summary report was prepared in November and December, 1997 to summarize the data collected from IHSS 118.1 during the fourth quarter of FY97. A non-aqueous phase liquid (NAPL) was found in some of the wells and carbon tetrachloride, chloroform, and methylene chloride were detected in the soils, water, and NAPL samples. A decision document will be initiated in the second quarter of FY98 and will include an alternatives evaluation to determine the best interim action for the IHSS.

# 6.2. Decontamination & Decommissioning Cluster Closure Projects

#### 6.2.1 Decommissioning Program Plan

CDPHE and EPA review of the September 19, 1997 draft Decommissioning Program Plan (DPP), resulted in an "Evaluated as Unapprovable" decision as stated in their October 6, 1997 letter. Meetings held since that decision with CDPHE and EPA, have resulted in progress being made in reaching agreements on document intent and content. Subsequently, a decision was made to reconvene the Facility Disposition Working Group (FDWG) to rewrite the DPP incorporating agreements reached. While all parties recognize the desirability of the DPP, no final date for completion has yet been established. A meeting of the FDWG is scheduled for January 16, 1998 to review suggested document language and discuss schedule.

# 6.2.2 Building Radiation Closure Standards

The working group (DOE, CDPHE, EPA and K-H), formed to recommend building radiation closure standards, was placed "on hold" pending evaluation of Nuclear Regulatory Commission (NRC) decommissioning regulations. The NRC issued separate decommissioning regulations in August that could impact RFETS. Implementation guidance is tentatively planned to be available in February. A separate evaluation group may be evaluating the guidance for application as RFETS closure standards. Depending upon this outcome, this evaluation group may terminate or be re-chartered.

# 6.2.3 Decommissioning Operations Plan for the Building 779 Cluster Closure Project

Comments from DOE, CDPHE and EPA were incorporated into the Draft Decommissioning Operations Plan (DOP) and the document was released for Public Comment on December 1, 1997. Following a 45-day comment period, comments will be dispositioned and the document submitted for final review and approval by CDPHE, as the Lead Regulatory Agency.

#### 6.2.4 Building 980 Complex Closure Projects

The Building 980 Complex Closure Project was completed on September 30, 1997 and the project has been closed out.

# 6.2.5 Building 886 Cluster Closure Project

FY98 decommissioning funding was approved to initiate decommissioning with the preparation of the RFCA required decision documentation. Specific documentation to be completed with the authorized funding includes the Reconnaissance Level Characterization Report (RLCR) and the IM/IRA. The draft RLCR was completed and submitted to DOE on December 15, 1997. Following DOE's review and comment, the document will be submitted to CDPHE and EPA in accordance with RFCA. A scoping meeting for the draft IM/IRA was held with CDPHE and EPA on December 10, 1997. A draft IM/IRA is in process and will be submitted to CDPHE and EPA to continue the consultation process on that document during the second or third quarter of FY98.

# 6.2.6 Building 771 Cluster Closure Project

The 771 Closure Project scope includes the deactivation, decontamination, decommissioning, and demolition of Building 771/774, ancillary support structures, trailers, plant systems and utilities, underground tank systems, and waste sites associated with the 771 complex.

An integrated approach towards closure is being implemented that is expected to accelerate closure of this complex significantly. The B771 closure project is being developed to integrate the final mission or risk-reduction work, SNM holdup removal, deactivation, and decommissioning.

Risk-reduction efforts are currently in process -- hydrogen venting has been completed, all liquid tanks have been drained; in FY98, process piping is scheduled to be drained, SNM hold-up removal will begin, and most residues will be shipped from the building. A Reconnaissance Level Characterization Plan, Survey, and Report have been completed for the B771 closure project. A DOP for the B771 closure project will be delivered to the Department of Energy by early third quarter FY98 for subsequent submission to the regulatory agencies.

# 7.0 List of Approved Decision Documents

Pursuant to RFCA paragraph 122, DOE is required to update the list of all approved documents, other approvals, and final resolutions of dispute contained in Attachment 12. There were no approvals of decision documents, other approvals or final resolutions of dispute during the first quarter of FY98; consequently Attachment 12 has not been updated this quarter.

# Status of RFCA Milestones, Target Activities and Site Closure Projects

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Driver	Commitment	Onicial Due, At RISK? Date (Y/N)	(Y/N)	Status/ Comments Actual Compl.
R/MILE STONE	FY98-M1 Either A) construct new facility for storage of TRU/TRM by 9/30/98; or B) by 9/30/98 demonstrate adequate storage available for	80/06/0	z	Description of demonstration has been provided to regulators. Agreed to reassess situation during 2nd qtr. FY98.
R/MILE STONE	FY98-M2 Complete construction of a new TRU/TRM repackaging facility by 9/30/98.	86/06/6		On Schedule; Request for proposals sent out and bids received.
R/MILE STONE	FY98-M3 Complete removal of 40 gloveboxes from Building 770 by 9/30/98.	86/08/6		DOE has invoked RFCA dispute resolution process.
R/MILE STONE	FY98-M4 Either A)ship cumulative 48% of 10/1/96 pondcrete/saltcrete inventory offsite & evacuate all wastes from Tents 2, 8, 12 by 9/30/98 and			On schedule; as of 12/31/97 1811 cubic meters of saltcrete/pondcrete have been shipped.
	OR B) make the decision to construct additional onsite storage for pondcrete/saltcrete by 9/30/98.	86/06/6	z	
STONE	FY98-M5 (98-4) Ship 375 drums of TRU/TRM to WIPP by 9/30/98 assuming a May 1, 1998 opening.	86/06/6	z	On Schedule
RAMILE STONE	FY98-M6 Meet or exceed the previous year's offsite shipment of LLW.	96/30/68	z	On Schedule; as of 12/31/97 404 cubic meters of LLW has been shipped.
R/MILE STONE	FY98-M7 Complete Trench T-1 accelerated cleanup by 9/30/98.	96/06/6	z	On Schedule
R/MILE STONE	FY98-M8 Complete work described in PAM for Building 123 and 123S by 9/1/98.	9/1/68	z	On Schedule
R/MILE STONE	FY98-M9 Develop, finalize, and begin implementation a sitewide natural resources management plan by 9/30/98.	86/06/6	z	On Schedule. Natural resources mgmt plan & the buffer zone mgmt plan have been combined.
R/TARGET		86/06/6		DOE has invoked RFCA dispute resolution process.
R/TARGET	FY98-T5 Thermally stabilize 90% of the plutonium oxide generated during the year.	86/06/6	z	On schedule
R/TARGET	1	86/08/6	z	On schedule
R/TARGET	-	86/08/6	z	On schedule
CLOSURE PROJECT	oui			Preparing Amendment to CAD/ROD specifying long-term monitoring w/NFRA.
CLOSURE	one.			Awaiting final RFI/RI report approval.
CLOSURE PROJECT	903 Pad and Lip Area.			Awaiting final approval of SAP; Field work scheduled for 2nd qtr FY98.
CLOSURE PROJECT	Mound Plume		-	Installation of Collection/treatment system scheduled for 2nd qtr. FY98.
CLOSURE PROJECT	East Trenches and 903 Pad/Ryan's Pit Plumes			Development of SAP and characterization scheduled for 2nd qtr. FY98.
CLOSURE PROJECT	Solar Ponds Plume			Sampling of vegetation complete; groundwater and soil sampling scheduled for 2nd qtr. FY98.
CLOSURE PROJECT	IHSS 118.1			Data Summary Report Complete; a decision document draft will be initiated in the 2nd qtr. of FY98.
CLOSURE PROJECT	Building 779 Cluster Closure Project			DOP Public comment period began on 12/1/97.
CLOSURE PROJECT	Building 886 Cluster Closure Project			Reconnaissance Level Characterization Plan, Survey and Report complete.
CLOSURE PROJECT	Building 771 Cluster Closure Project			Reconnaissanc Level Characterization Plan, Survey and Report complete.